

Testimony before the FCC Clear Channel Hearing for the National Association of Educational Broadcasters

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The National Association of Educational Broadcasters submits the following presentation to assist the Federal Communications Commission in its determination on issues 2, 5, 7, 8, 10 and 11. This association represents 24 active AM and FM educational broadcast stations. These are the stations that weathered the mass deletions of the twenties and the difficult days of the thirties which saw many fall by the wayside. Educational institutions pioneered in the technical development of radio broadcasting when it was in its infancy, and are now pioneering in the field of educational programs for the betterment of the people of the United States. Therefore, this association of active educational broadcasters feels qualified to submit the following resolution and discussion thereof for the consideration of the Federal Communications Commission.

RESOLUTION--The National Association of Educational Broadcasters, assembled at Chicago September 17-18, 1945, resolved to submit to the Federal Communications Commission its position with relation to the pending Clear Channel Hearing.

1. In its review of the evidence submitted at this hearing, the Commission is urged to consider the unique public services rendered by the educational and non-profit radio stations of the country.

A study of the record of these stations must reveal the type of service which is not duplicated by any other group of stations in the United States. Their operation is truly in the public interest, convenience and necessity.

2. The Association urges that the Commission seriously consider the contention that the principle of public service must prevail over the traditional yardstick of the protection of unreasonable coverage.

3. The resources of America's leading educational institutions should be available to all. Yet the broadcast facilities of these stations are at this time so limited in terms of power, frequency and hours of operation that only a portion of the available service is being broadcast.
4. Our members are ready and, because of years of broadcast experience, are able to carry on an expanded radio service.

The National Association of Educational Broadcasters respectfully urges that the rules regarding Clear Channel operation be revised. Revision should be such that full-time operation, sufficient power, and improved facilities be made possible in order to provide adequate service to listeners in those areas which the educational stations should rightfully serve.

To expand on this resolution, educational broadcasters accept without qualification the American system of broadcasting and at the same time believe that educational stations fill a need which is a weak spot in the American pattern. This type of broadcasting is interested in and directed to the individual listener, which in itself is a protection of the rights of the minority. The program yardstick is not the mass appeal so necessary to a successful commercial program, but rather the educational and cultural value of the program to the individual listener.

This hearing is to seek an engineering solution of the AM allocation problem especially with respect to clear channel operation. The fundamentals of engineering on which the FCC standards have been based have not changed. While it is true that receivers have been improved somewhat so that adjacent channel protection standards may be high, by and large the standards of interference have not changed. However, the weighting of the loss of service to one station by the

operation of another against the increased service provided by the other station has changed. The true engineering solution must consider both of these elements of the problem, each in its proper proportion as determined by the criterion of public service. The National Association of Educational Broadcasters therefore submits the following specific recommendations in addition to those outlined in the resolution previously mentioned. 1) Clear channel stations should be allowed to serve their primary sphere of influence, which in no case should extend beyond the primary trading area of the community in which the station is located. 2) Where it is shown that a definite loss of rural service will result from a breakdown of a clear channel and where it is shown that it is not possible to equal or better this rural service by the addition of new stations as a result of a breakdown of clear channels, such channels should be protected. 3) Wherever technically feasible, educational stations should be given Class II assignments on clear channels to provide adequate service to submarginal areas and to meet the need for educational programs which are often economically submarginal for the commercial station. Educational stations only are in a position to provide this service. In response to a questionnaire sent to all educational stations, the membership of the National Association of Educational Broadcasters stand ready to accept this obligation to improve broadcast service in this country.

Scanned from the National Association of Educational Broadcasters Records  
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